



**CITY OF DANBURY**  
**DEPARTMENT OF PUBLIC UTILITIES**  
155 DEER HILL AVENUE  
DANBURY, CT 06810



January 21, 2010

Memo To: Connecticut DEP, Bureau of Water Protection and Land Reuse

From: David Day, P.E., Superintendent of Public Utilities, Danbury, CT.

RE: Proposed Stream Flow Standards and Regulations (As Published October 13, 2009)  
January 21, 2010 Public Hearing Comments

My name is David Day and I am the Superintendent of Public Utilities for the City of Danbury, CT.

My comments on the proposed stream flow standards and regulations are as follows:

- As the Danbury water system does not have excess safe yield, the proposed regulations would have serious detrimental effects on our system.
- Significant issues facing Danbury due to these proposed regulations include the following:
  - 5% reduction in average day safe yield for existing surface water supplies.
  - 63% reduction in safe yield for existing groundwater supplies.
  - A net safe yield loss of 13%
  - A safe yield loss of 13% will result in a margin of safety at or near 1.0
  - A margin of safety of 1.0 or less will result in a moratorium on both additional customers and planned expansions by existing customers, which would have a severe economic impact to the Danbury Region.
  - Other financial impacts facing Danbury due to these proposed regulations include but may not be limited to:
    - Facility modifications,
    - Additional staffing,
    - Significant rate increases,
    - Funding of additional water supply projects beyond current planned projects.

- While it is nice to see that the State has considered the financial impacts of these regulations on State Agencies, the same complete analysis must be done for all parties impacted by these regulations. I therefore find that it is imperative that the following key questions be sufficiently reviewed, addressed, and answered by CT DEP and other appropriate State Agencies prior to acceptance of these or any other proposed stream flow regulations:

Question No. 1:

How can these proposed regulations be accepted without a true and complete analysis of their financial impact on municipal water companies, private water companies, water customers, and the service area of these utilities being known?

Question No. 2:

Where is the environmental emergency that exists that warrants the acceptance of these proposed regulations without knowing the true financial impacts that they will cause?

- In closing, while I certainly understand that good environmental stewardship only serves to help satisfy our mission to maintain pure and adequate water supplies, I strongly oppose the current proposed stream flow regulations and standards, as they are unfunded mandates that do not support this mission.

Thank you for the opportunity to be heard on this very important matter.